

September 2, 2016

Meredith Attwell Baker
President and CEO
CTIA
1400 16th St NW #600
Washington, DC 20036
By email: mbaker@ctia.org

Dear Ms. Baker:

We are writing to express our concern that the next iteration of the CTIA SMS Interoperability Guidelines will no longer contain a statement regarding the role of the Responsible Organization (Resp Org) in approving text enabling Toll-Free Numbers (TFNs).

Since 1993, Resp Orgs have been the FCC-designated manager of TFNs on behalf of the end-user subscriber. Toll-Free evolved differently from most telecom services and has some unique characteristics that do not exist in the wireless industry, or even the rest of the wireline industry. Chief among them is the critically important role of the Resp Org.

Resp Orgs are the authoritative source of the entity or entities that are permitted to use that TFN, and what restrictions that TFN may have. The existing version of the CTIA guidelines - agreed to less than two years ago - acknowledges this crucial role, but that critically important distinction was removed in the most recent draft.

There are several cases where the Resp Orgs or another entity that is not the end user is in control of the TFN. Shared use is a hugely important one. For example, dial 1-800 TAXICAB and you'll get the local licensee for that number – one of dozens of users of that TFN across various geographic regions. If one entity text-enables that number, they'll get all the texts, not just the ones in their area. These are, far and away, the most valuable sets of Toll-Free numbers. Scores of companies offer shared use services, and some base their entire business on them.

Bundled services are another area where this is an issue. In bundled services, the Resp Org or provider of the bundled service retains control of the number. As the name implies, the phone number is bundled with other services and technology. It can be bundled with advertising, messaging, product fulfillment or other services. It is made clear to the customer that the TFN is integral to the provision of service and that TFN's rights remain with the bundled service provider.

Finally, some Resp Orgs and service providers use a leased number model. There, the Resp Org (or service provider) is leasing the number to the customer and the Resp Org retains rights to the number. While this is mostly done in conjunction with the shared and bundled services, some Resp Orgs will simply lease or license numbers for use by the customer. The Resp Org retains rights to the number. This is more likely to happen with a valuable "vanity" number that has repeating digits or spell out something in particular.

We believe that, of the more than 40,000,000 TFNs in use in the US today, 20-30% of all TFNs fall into these categories. They represent more than that in terms of revenue to the industry. This is a very significant issue for the future of Toll-Free.

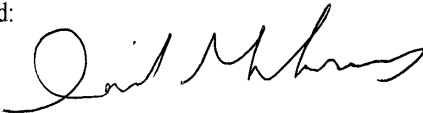
There have been cases documented at the FCC showing how the texting to TFN can be hijacked if the Resp Org is not part of the text-enablement process. This can lead to significant consumer and business harm. Consumers know that a single phone number will reach the intended party, whether that consumer uses a landline phone, VoIP, or a cellphone. The same should hold true if a consumer is texting that number: the recipient of a text message sent to a Toll-Free number – if that number is text-enabled – must be the same as the recipient of a call made to that same Toll-Free number. The only way to ensure that is to go through the Resp Org.

There are well-established channels, procedures and processes in the industry to activate a Toll-Free number or to change a customer's Resp Org. To ignore the decades of successful industry experience is simply reckless.

CTIA must recognize the importance of the role of the Resp Org in approving text-enabling TFNs. Without that crucial role, the future of texting to Toll-Free, and the integrity of Toll-Free Numbers are in jeopardy.

Sincerely,

Signed:



David Greenhaus, Director of Regulatory Affairs
800 Response Information Services, LLC

Signed:



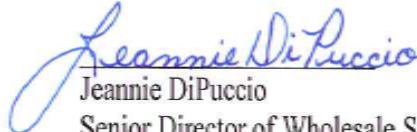
Chris Currie, CEO
Aerialink, Inc.

Signed:



Brian Lynott
CEO
ATL Communications

Signed:



Jeannie DiPuccio
Senior Director of Wholesale Services
ANI Networks

Signed:




Greg Rogers
Deputy General Counsel
Bandwidth.com, Inc.

Signed:




Alex Macis / Carrier Relations Manager, CallSource

Signed:


Steven S Levinn
President, csf Corporation

Signed:


Chris Lowe
Sr Director of Telecom & Technology
Dial800, LLC

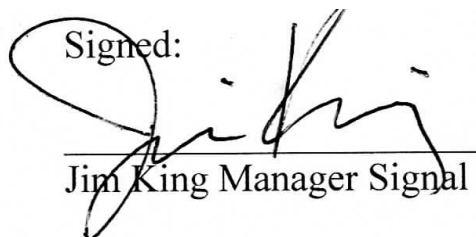
Signed:


Tim Taylor – Google Inc.


Signed:


Gene Lew, CTO
HeyWire Inc.

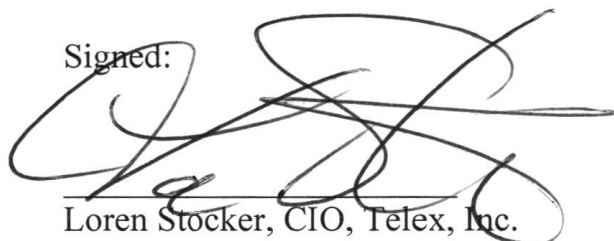
Signed:


Jim King Manager Signal One

Signed:


Joel Bernstein, VP Regulatory and Public Policy, Somos

Signed:


Loren Stocker, CIO, Telex, Inc.


Signed:


Greg Fernandez
President, THE Telco

Signed:


Noah Rafalko, CEO TSG Global, Inc.

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Douglas F. Gardner
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Lawrence Frankel (DOJ)
FCC Docket 08-7
FCC Docket 95-155